

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

RENALDO WHITE and RANDOLPH NADEAU,
individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

SYMETRA ASSIGNED BENEFITS SERVICE
COMPANY and SYMETRA LIFE INSURANCE
COMPANY,

Defendants.

CASE NO. 2:20-CV-01866-MJP

STIPULATED MOTION TO
EXTEND TIME FOR
SUBMISSION OF MOTION FOR
PRELIMINARY APPROVAL

NOTE ON MOTION CALENDAR:
January 24, 2025

The parties, Defendants Symetra Assigned Benefits Service Company and Symetra Life Insurance Company and Plaintiffs Renaldo White and Randolph Nadeau (collectively, the “Parties”) respectfully submit the following Joint Motion to Extend the Time for the Submission of the Motion for Preliminary Approval. In support of their request, the parties set forth the following:

On January 8, 2025, the Parties submitted a stipulated motion asking this Court to extend the time to execute the settlement agreement and submit any Motion for Preliminary Approval from January 10, 2025 to January 24, 2025. (Dkt. No. 153).

On January 10, 2025, this Court granted that request, extending the deadline for the parties to execute the settlement agreement and submit any Motion for Preliminary Approval to January 24, 2025. (Dkt. No. 154).

STIPULATED MOTION TO EXTEND TIME FOR
SUBMISSION OF MOTION FOR PRELIMINARY
APPROVAL - 1

CASE NO. 2:20-CV-01866-MJP

#5780716 v2 / 42726-394

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Following that extension, the Parties have worked diligently to finalize the settlement agreement and all other necessary paperwork. While Defendants anticipated being able to provide final signoff in accordance with the existing January 24, 2025 deadline, due to an unforeseen issue, they are unable to do so until early next week. Accordingly, Defendants respectfully request that the Parties be permitted a brief extension with which to finalize the settlement, and plan to submit it and a Motion for Preliminary Approval (and any related papers) on or before January 29, 2025.

Therefore, the parties jointly request that the Court reset the deadline for the execution of the settlement agreement and the submission of the Motion for Preliminary Approval to **January 29, 2025**.

DATED this 29th day of January, 2025.

KELLER ROHRBACK L.L.P.

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10 *Attorneys for Plaintiffs*

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12 IT IS SO ORDERED.

13 Dated this 29th day of January, 2025.

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16 Marsha J. Pechman
17 United States Senior District Judge
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STIPULATED MOTION TO EXTEND TIME FOR
SUBMISSION OF MOTION FOR PRELIMINARY
APPROVAL - 3

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STIPULATED MOTION TO EXTEND TIME FOR
SUBMISSION OF MOTION FOR PRELIMINARY
APPROVAL - 4
CASE NO. 2:20-CV-01866-MJP
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